

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

ADRIAN DUNNING ,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 2:18-cv-01895-LCB-SGC
)	
RODERICK GADSDEN, et al.,)	
)	
Defendants.)	

NOTICE OF DEPOSITION TO DEFENDANTS

Notice is hereby given, pursuant to the Federal Rules of Civil Procedure, Rule 30, that Plaintiffs, by and through their attorneys, intend to take the deposition of the following Defendants and/or employees of ADOC:

- Roderick Gadsden aka Roderick Gadson
- Keller Specks, Correctional Officer
- Zackery McLemore, Correctional Officer
- Brandon Mitchell, SGT
- Raymond Gaines, Correctional Officer
- Troy Hart, Correctional Officer
- Clifton Sanders, Correctional Officer
- Gwendolyn Givens, Warden
- Sterling Stead, Correctional Officer
- Jefferson S. Dunn Commissioner ADOC
- Ruth Naglich, Associate Commissioner Health Services
- Cheryl Price Regional Coordinator
- David Tytell, Chief Clinical Psychologists

on oral examination before a notary public or some other person duly qualified to administer an oath, at a time and date TBD at Donaldson Correctional Facility located at 100 Warrior Lane, Bessemer, AL 35023, to be continued from day-to-day until completed. The testimony will be recorded by audiovisual as well as stenographic means.

The deponents are hereby notified to personally appear and attend at the time and place specified for the purposes of having their depositions taken in accordance with the foregoing Notice.

Pursuant to Rule 30(b)(2) of Fed. R.Civ.P., Plaintiff requests that at the time and place of taking said deposition, the above referenced deponent bring with her the following documents or things: See Plaintiff's Request for Production of Documents.

Date: December 17, 2019

Respectfully submitted,

/s/ Richard A. Rice

Richard A. Rice

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